

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA
Philadelphia Division

James Harold Cooper,

Debtor.

Chapter 13

Case No. 24-11994-pmm

Motion to Impose the Automatic Stay

Debtor James Harold Cooper, by their attorney, moves this Court as follows:

1. The Debtor filed a bankruptcy petition on June 11, 2024. They will soon file a plan and all schedules, statements, and other documents required by 11 U.S.C. §521(a)(1) and Fed. R. Bankr. P. 1007(b).
2. The Debtor's following two cases were dismissed within the past year:

Case No.	Chapter	Filed	Dismissed	District
24-11003-pmm	13	March 25, 2024	April 25, 2024	Eastern District of Pennsylvania
24-11808-pmm	13	May 28, 2024	June 10, 2024	Eastern District of Pennsylvania

3. Consequently, the automatic stay is not in effect. 11 U.S.C. § 362(c)(3)(A).
4. The Court may impose the automatic stay upon notice, hearing, and a showing that the instant case was filed in good faith. 11 U.S.C. § 362(c)(3)(B). A case is filed in good faith when there are positive changing circumstances showing that a debtor can successfully see a chapter 13 through to the end. In re Legree, 285 B.R. 615, 620 (Bankr. E.D. Pa. 2002).

5. This case was filed in good faith.

6. Because this case was filed in good faith, the Court must impose the automatic stay against all creditors for the duration of this case.

For these reasons, the Court must grant relief in the form of order attached, and further in the Debtor's favor if necessary and proper under the law.

Date: June 11, 2024

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